

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE: ) In Proceedings Under Chapter 11  
)  
DOUBLE HELIX CORPORATION, ) Case No. 25-40745  
d/b/a KDHX COMMUNITY MEDIA, )  
)  
Debtor. )

**DEBTOR'S MOTION FOR ENTRY OF AN ORDER AUTHORIZING  
DEBTOR TO MAINTAIN CASH MANAGEMENT SYSTEM**

COMES NOW Double Helix Corporation, d/b/a KDHX Community Media as Debtor and Debtor in Possession (“**Debtor**”), by and through its undersigned counsel, and respectfully states the following in support of this Motion:

**BACKGROUND AND JURISDICTION**

1. On March 10, 2025 (the “**Petition Date**”), Debtor filed its voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “**Bankruptcy Code**”) in the United States Bankruptcy Court for the Eastern District of Missouri. Pursuant to sections 1107(a) and 1108 of the Bankruptcy Code, Debtor is continuing to operate its business as debtor in possession. No trustee or examiner has been appointed, and no official committee of creditors or equity interest holders has been established in this chapter 11 case (the “**Chapter 11 Case**”).

2. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue of this Chapter 11 Case and Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

**RELIEF REQUESTED**

3. Debtor maintains a cash management system (the “**Cash Management System**”) in the ordinary course of business. The Cash Management System is comparable to the centralized cash management systems used by similarly situated companies to manage cash in a cost-effective,

efficient manner. Debtor uses the Cash Management System in the ordinary course of its business to collect, transfer, and disburse funds generated from its operations and to facilitate cash monitoring, forecasting, and reporting. Debtor maintains daily oversight over the Cash Management System and implements cash management controls for entering, processing, and releasing funds. Additionally, Debtor regularly reconciles its books and records to ensure that all transfers are accounted for properly.

4. Debtor's cash management system is facilitated through its operating accounts with Enterprise Bank & Trust

5. Debtor seeks authority to open a debtor in possession account and maintain the Cash Management System with the funds currently held in Enterprise Bank & Trust, a financial institution which have been designated as an authorized depository by the Office of the United States Trustee for Region 13.

6. Continued use of the Cash Management System will facilitate Debtor's transition into chapter 11 by, among other things, avoiding administrative inefficiencies and expenses associated with disrupting this system and minimizing delays in the payment of postpetition obligations. Debtors respectfully submit that parties-in-interest will not be harmed by Debtor's maintenance of the Cash Management System because Debtor's implemented appropriate mechanisms to ensure that unauthorized payments will not be made on account of prepetition obligations.

7. Debtor requests that the Court grant further relief from the U.S. Trustee Operating Guidelines to the extent they require the Debtor to make all disbursements by check. In particular, the U.S. Trustee Operating Guidelines require that all receipts and all disbursements of estate funds must be made by check with a notation representing the reason for the disbursement. In the

ordinary course of business, Debtor conducts transactions through ACH transfers and other similar methods. In addition, a certain percentage of Debtor's receipts may be received through wire transfer payments. If Debtor's ability to conduct transactions by debit, wire, ACH transfer, or other similar methods—including its ability to pay associated fees—is impaired, Debtor may be unable to perform under certain contracts, its business operations may be unnecessarily disrupted, and its estate will incur additional costs.

WHEREFORE, Debtor Double Helix Corporation, d/b/a KDHX Community Media respectfully requests entry of an Order authorizing Debtor to maintain its Cash Management System at Enterprise Bank & Trust, and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

CARMODY MACDONALD P.C.

By: /s/ Robert E. Eggmann  
ROBERT E. EGGMANN #37374MO  
THOMAS H. RISKE #61838MO  
NATHAN R. WALLACE #74890MO  
120 S. Central Avenue, Suite 1800  
St. Louis, Missouri 63105  
(314) 854-8600  
(314) 854-8660 – FAX  
[ree@carmodymacdonald.com](mailto:ree@carmodymacdonald.com)  
[thr@carmodymacdonald.com](mailto:thr@carmodymacdonald.com)  
[nrw@carmodymacdonald.com](mailto:nrw@carmodymacdonald.com)

PROPOSED ATTORNEYS FOR DEBTOR